

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NATHAN BROWN,)
)
Plaintiff,)
) Case No: CIV-24-959-SLP
v.) Judge Scott Palk
)
ENCOMPASS INSURANCE COMPANY)
OF AMERICA,)
)
Defendant.)

**JOINT MOTION TO CONTINUE SCHEDULING DEADLINES AND ENTER
PROPOSED SCHEDULING ORDER**

The Parties hereby move this Court to continue all Scheduling Deadlines and enter the attached Proposed Amended Scheduling Order. In support of this Motion, the parties show this Court as follows:

1. This Court entered a Scheduling Order on October 28, 2024.
2. This matter is set on the trial docket for August 2025.
3. At the time of this filing, there are several Scheduling Order Deadlines quickly approaching, namely the mediation deadline that is set for March 3, 2025, for which additional discovery is needed.
4. Counsel are in agreement that the current deadlines should be continued to allow for full and complete discovery.
5. All parties agree with this Motion.

6. In light of these factors, additional time is necessary to complete discovery, including party, witness and expert deposition. The parties agree that a ninety (90) day continuance of all deadlines set by the current Scheduling Order is warranted.

7. An agreed Amended Scheduling Order is attached to this Joint Motion for the Court's review and approval.

8. WHEREFORE, the parties respectfully move this Court to enter an Order continuing the Scheduling Order Deadlines as proposed in the attached Amended Scheduling Order.¹

Respectfully submitted,

/s/ Jasper V. Abbott.
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¹ The trial date is left blank to allow the Court to place this matter on the appropriate trial docket.